

EXHIBIT 2

GIBSON DUNN

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VIA ELECTRONIC MAIL

James L. Etheridge
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Re: WSOU Investments, LLC v. Dell Techs. Inc. and EMC Corp., Case Nos. 6:20-cv-473 to -482, 6:20-cv-485; 6:20-cv-486 (W.D. Tex.)

Dear Jim:

We write to address two discovery issues.

First, the parties were obligated to produce correspondence they had with the targets of Defendants Dell Technologies Inc., Dell Inc., EMC Corporation, and VMware, Inc. (collectively, “Defendants”) Letters of Requests (“LoRs”). While Defendants complied with the Court’s instructions, WSOU has not. Defendants were willing to table the issue until the opening of fact discovery. Specifically, on April 14, 2021, Defendants requested that, upon the opening of fact discovery, WSOU produce all correspondence between WSOU and the third parties relevant to Defendants’ outstanding LoRs.

Second, by a letter also dated April 14, 2021, Defendants requested that WSOU produce any relevant discovery WSOU receives in the related actions once fact discovery opens.

As WSOU is aware, fact discovery opened on May 27, 2021. To date, WSOU has not produced any of the above requested documents and information. To ensure WSOU’s compliance, Defendants served Requests for Production 14, 68, and 69, which pertain to the abovementioned documents.

WSOU never responded to either of the above mentioned letters. As WSOU has already delayed legitimate discovery, please confirm that WSOU will promptly make its production with respect to these two issues. If not, Defendants demand an immediate meet and confer so that they can seek relief from the Court.

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Best,

/s/Brian A. Rosenthal

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